

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PAULA GILL,
Plaintiff,

V.

M/S NORWEGIAN,
SPIRIT and,
NCL (Bahamas) Ltd.,
Defendants.

COMPLAINT
Civil Action No. 10-11548

INTRODUCTION

1. This is an action for maritime personal injuries which occurred on or about September 16, 2009 while the Plaintiff, Paula Gill, was a passenger aboard the M/S NORWEGIAN SPIRIT, which was owned, operated, chartered and/or controlled by the Defendants. The Plaintiff asserts a cause of action against each Defendant for personal injuries based upon negligence pursuant to the General Maritime Law.

JURISDICTION AND VENUE

2. This is a maritime case being brought pursuant to 28 U.S.C. § 1333(1).
3. Venue is proper pursuant to 28 U.S.C. § 1391(c).

PARTIES

4. The Plaintiff, PAULA GILL, is of legal age and resides in Whitman, Massachusetts.
5. The Defendant, NCL (Bahamas) Ltd., is a Bermuda entity with a principal place of business in Miami FL and, at all relevant times, owned, maintained, financed, managed, operated, chartered and/or controlled the vessel known as the M/S NORWEGIAN SPIRIT.

FACTUAL ALLEGATIONS

6. On September 12, 2009, the Plaintiff, Paula Gill, was a passenger on a cruise aboard the M/S NORWEGIAN SPIRIT which was transporting passengers for hire for purposes of a cruise from Boston, MA to King's Wharf, Bermuda. The vessel was in navigable waters and while the Plaintiff was in the exercise of due care, she sustained serious personal injuries due to the negligence of the Defendants, their agents, servants and/or employees.
7. Specifically, the Defendants failed to maintain, warn, and/or restrict access to a defective doorway on the outer deck, leading into the casino, where Plaintiff was caused to be knocked down, sustaining injuries to her head, neck and mouth.

COUNT I

Paula Gill v. NCL (Bahamas) Ltd.
(General Maritime Law – Negligence)

8. Paragraphs 1-7 are realleged and incorporated herein by reference.
9. The injuries sustained by the Plaintiff were due to no fault of her own, but were caused by the negligence of the Defendant.
10. As a result of said injuries, the Plaintiff has suffered great pain of body and anguish of mind, incurred medical and hospital expenses, loss of time from her usual work, and has suffered and will suffer other damages as will be shown at the trial of this matter.
11. This cause of action is brought for Negligence under the General Maritime Law.

REQUEST FOR RELIEF

12. That this Court, under Count I, enter judgment in favor of the Plaintiff against the Defendant.
13. For such other relief as this Court deems appropriate.

THE PLAINTIFFS REQUEST TRIAL BY JURY ON ALL COUNTS

Respectfully submitted,
Plaintiff,
By her attorney,

/s/ Brian Keane
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